

REMARKS

Favorable reconsideration of this application is respectfully requested.

Claims 15-24 are pending in this application. Claims 15, 18, 21, and 24 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. patent 6,661,530 to Munetomo et al. (herein "Munetomo") in view of U.S. patent 6,069,637 to Gaglione et al. (herein "Gaglione"). Claims 16, 19, 20, and 22 were rejected under 35 U.S.C. § 103(a) as unpatentable over Munetomo in view of Gaglione. Claims 17 and 23 were rejected under 35 U.S.C. § 103(a) as unpatentable over Munetomo in view of Gaglione and further in view of U.S. patent 6,462,756 to Hansen et al. (herein "Hansen").

Addressing the above-noted rejections, those rejections are traversed by the present response.

The claims are directed to allowing a **printer driver** to perform an editing operation of inserting one of a text, an image, and a graphic into a displayed image. Such features are reflected in the claims and are neither taught nor suggested by any of the newly cited art, in any combination.

More specifically, the claims are directed to features of a **printer driver performing editing processes on image data** after a command to print a document has been issued. That is, in the claimed invention after a command to print a document has been executed and has been received by a printer driver, then in the present invention an editing process of inserting at least one of a text, an image, and a graphic into a displayed image can still be performed. Such features are believed to clearly differ from the applied art.

As discussed in the present specification with respect to the background, when an image to be printed is edited, a document can be processed in an application.¹ However, the applicants of the present recognized that such an editing in an application cannot be simply

¹ Specification at page 1, lines 19-21.

performed and processed by a printer driver, and therefore the claimed invention provides a novel printing image forming apparatus and method enabling an operator to simply edit, on a printer driver, a document on a computer and to print the document.² Thereby, in the present apparatus and method an application is first activated to issue an order to print an original document, and then a printer driver is activated to start to operate.³ Then, at least one of a text, an image, and a graphic is inserted into the original document while operating the printer driver. Then, various steps are taken by the printer driver to allow the printing of the document. Such features of the performing the noted operations in a printer driver of a printing image forming apparatus are believed to clearly distinguish over the applied art.

In the present invention an editing process on image data is performed on the printer driver instead of on applications, unlike the prior art.

Addressing first the primary reference to Munetomo, Munetomo appears to disclose a conventional system of a printer in Figure 1 showing an application 1-12 and a printer driver 1-15 as part of a memory 1-11 of a computer 1-1. However, applicants respectfully submit Munetomo does not disclose or suggest any operation in which the printer driver 1-15 can insert at least one of a text, an image, and a graphic into a displayed image.

Munetomo appears to disclose a conventional printer driver that does not have any editing operations such as noted above. Munetomo specifically states “[t]he printer driver 1-15 which is specific to each model of printers, reconfigures the printing data sent from the operating system 1-14 into a form that the printer 1-4 can directly recognize, and sends the reconfigured data to the printer interface 1-6”.⁴ From this disclosure Munetomo discloses the printer driver 1-15 as a conventional printer driver that cannot perform any editing operations.

² Specification at page 2, lines 4-9.

³ Specification at page 4, lines 1-4.

⁴ Munetomo at col. 8, lines 26-30.

With respect to the feature of being able to insert an image into a displayed image, the outstanding rejection cites Munetomo at col. 3, line 64 through col. 4, line 11. That basis for the outstanding rejection is not at all understood. That basis for the outstanding rejection appears to reference an 11th embodiment in Munetomo and an operation of a double-sided printing mode, but does not disclose any operation of inserting an image into a displayed image. Details of such an 11th embodiment are also noted in Munetomo at col. 20, line 4 et seq. At that portion, Munetomo does not disclose any operation in which a printer driver can insert an image into a displayed image.

Therefore, Munetomo does not disclose or suggest the printer driver taking any sort of editing operation of being able to insert any material into a displayed image. In such ways, Munetomo does not disclose the above-noted features recited in the claims.

Moreover, as apparently recognized in the Office Action, Munetomo does not disclose specifics of inserting at least one of a text, an image, and a graphic into a displayed image via a printer driver.

To overcome that recognized deficiency in Munetomo the outstanding rejection cites Gaglione at col. 7, line 29 through col. 8, line 35, and also Figure 7. However, applicants note such teachings in Gaglione first are not related to the teachings in Munetomo and are not related to the claimed features.

At the noted portion in Gaglione, Gaglione discloses an editing operation in which a text mode can be entered into, to provide text for an image. However, such teachings in Gaglione are not performed by a printer driver. Such teachings in Gaglione would appear to be performed by a device such as the application 1-12 in Munetomo. Thereby, if such teachings in Gaglione were combined with the teachings in Munetomo, that would allow the application 1-12 in Munetomo to be able to enter a text entering mode to allow text to be entered.

However, the claims are not directed to such a feature.

The claims are directed to a ***printer driver*** being able to insert at least one of a text, an image, and a graphic into a displayed image. Neither Munetomo nor Gaglione teach or suggest such a feature, and no combination of teachings of Munetomo or Gaglione would suggest such a feature.

As noted above, Munetomo discloses an application 1-12 that would appear to perform editing operations, and a printer driver 1-15 that formats data for printing. Munetomo does not disclose or suggest the printer driver 1-15 being able to perform any editing of inserting at least one of a text, an image, and a graphic to a displayed image.

Moreover, Gaglione also does not teach or suggest the printer driver being able to perform an editing to insert at least one of a text, an image, and a graphic into the displayed image. Thus, combining the teachings of Gaglione and Munetomo would not result in the above-noted claimed feature. As noted above, any combination of teachings in Gaglione and Munetomo would at most result in the application 1-12 in Munetomo being able to enter a text entering mode. That is not what the claims recite, as noted above.

In such ways, applicants respectfully submit the combination of teachings of Munetomo in view of Gaglione does not meet the limitations of the claims as currently written.


Moreover, no teachings in Hansen are believed to overcome the above-noted deficiencies of Gaglione and Munetomo.

In view of these foregoing comments, applicants respectfully submit that the claims as currently written distinguish over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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